

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

League of United Latin American Citizens – )  
Richmond Region Council 4614, et al., )  
Plaintiffs, )  
v. ) Civil Action No. 1:18-cv-00423-LO-IDD  
Public Interest Legal Foundation, an Indiana )  
Corporation, )  
and J. Christian Adams )  
Defendants, )

**JOINT MOTION OF THE PARTIES FOR ENTRY OF A STIPULATED PROTECTIVE  
ORDER REGARDING CONFIDENTIALITY**

The Parties are producing certain information in discovery that they consider to be confidential and/or proprietary. The Parties wish to safeguard such confidential and proprietary information and would like to produce certain information pursuant to an appropriate protective order. No Party objects to the entry of a protective order to safeguard this information.

Based on the foregoing and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the Parties jointly request entry of the Proposed Stipulated Protective Order attached as Exhibit 1 to this motion. The Parties waive any right to a hearing on this motion.

Dated: March 6, 2019

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Christopher S. Herlihy, hereby certify that on March 6, 2019, I have electronically filed the foregoing Joint Motion of the Parties for Entry of a Stipulated Protective Order Regarding Confidentiality with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record, including:

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